

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**CLEMENT WOGHIREN,**  
**Plaintiff,**

**V.**

**WYETH and WYETH BIOPHARMA,  
Defendants.**

**CIVIL ACTION NO. 04-12148 WGY**

## PLAINTIFF CLEMENT WOGHIREN'S PROPOSED VOIR DIRE

The Plaintiff Clement Woghiren hereby respectfully requests that the Court ask the following questions of the jury pool in addition to those questions ordinarily asked by the Court:

1. Have you, or has any member of your immediate family, household, or any close friend ever been employed by Wyeth or Wyeth Biopharma?
2. Have you ever heard of Wyeth or Wyeth Biopharma, seen any advertising for their products or used any of their products? If so, have you formed any opinion about Wyeth or Wyeth Biopharma?
3. Do you own any stock issued by Wyeth or Wyeth Biopharma?
4. Do you have any personal feelings about Wyeth and/or Wyeth Biopharma that will make it difficult for you impartially to consider a case against Wyeth or award fair and adequate damages to the plaintiff if the evidence and law warrant it?
5. Have you or a member of your family or a close friend ever been involved in a lawsuit involving a discrimination claim?

6. Have you or a member of your family or a close friend ever been involved in a lawsuit in which there was a claim of retaliation?
7. Have you or a member of your family or a close friend ever been accused of discrimination?
8. Have you or a member of your family or a close friend ever been accused of retaliation?

Respectfully Submitted,

Clement Woghiren,

By his Attorneys,

/S/ John F. Tocci

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